



**THE UNITED STATES VIRGIN ISLANDS**

OFFICE OF THE GOVERNOR  
GOVERNMENT HOUSE

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**340-774-0001**

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Jane Lubchenco, Ph. D.  
Under Secretary  
**National Oceanic and Atmospheric Administration**  
Room 5128  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Under Secretary Lubchenco:

I am writing in support of concerns expressed by U.S. Virgin Islands fishermen to the Caribbean Fisheries Management Council ("CFMC") that current efforts by the National Marine Fisheries Service ("NMFS") to meet deadlines imposed by the Magnusan-Stevens Reauthorization Act, without their in-put, will threaten the viability of our local fishing industry. The consequence of this decision will lead not to an elimination of overfishing, but rather an exacerbation of problems within the industry by forcing fishing to relocate into Territorial waters. This will create severe problems in insuring that Territorial and Federal regulations are compatible and that consistent management takes place throughout the range of the fishing stocks involved.

In addition to the substantive questions raised, there is a strategic policy implication being made in what appears to be NMFS by-passing the CFMC, who has responsibility for establishing these regulations. This strategy has ignored the efforts of Territorial fishermen who are taking steps to reduce effort levels, have undertaken studies which will lead to a reduction in bycatch and who have been working to develop a collaborative approach to management of our fishery resources.

It is my opinion that the concerns and suggestions of the Territory's fishermen are being ignored. In an attempt to address their concerns, I directed the St. Thomas Fishermen's Association to prepare a presentation regarding how they felt the Magnusan-Stevens requirements could be achieved while, at the same time, improving data programs without creating any undue

burden on the stakeholders. In reviewing the proposals (which were unsolicited by the CFMC), there aren't any indications that any element of their proposal has been taken into consideration.

Briefly that proposal involves:

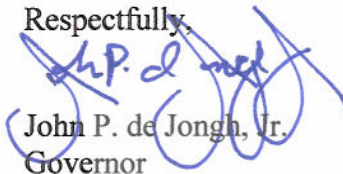
1. Specific quotas for spiny lobster, queen conch, and a species complex of "Jacks".
2. For the Trap fish complex (which includes over 100 species) they propose a single quota for the entire complex. Species detail would be monitored through improved port sampling and several "indicator" species' weights would be reported directly by the fishermen. This approach is clearly allowable under the Magnusan-Stevens guidelines.
3. The fishermen would cooperate in an effort to improve data collection, reduce trap fishing effort, and implement escape vents in traps to reduce bycatch.
4. The Fishermen would seek funding to implement a monthly data input and catch projection effort accompanied by in-season management in order to remain beneath quota levels.

It is not the intent of the Territorial fishermen to ignore sound and supportable regulation. They seek collaborative management in which improved performance in the fishery supports Federal and Territorial requirements. Clearly, this is a more desirable end than the current climate of distrust and confrontation.

There is still time to meet the Magnusan-Stevens deadlines in a collaborative manner. I ask that you direct the appropriate parties to convene such an effort before more time is lost by the current non-collaborative strategy.

I am prepared to meet with you or your representative on this matter.

Respectfully,



John P. de Jongh, Jr.  
Governor